

# EXHIBIT A



**Tyler Maul**  
**02/05/2024**

**Page 91**

1 purpose of the meeting was?

2 **A. I mean, like they started it off, of course. I don't**  
3 **know the exact wording of it.**

4 Q. Okay. But I mean, general sense you remember them  
5 saying the purpose of that is we want to talk about your  
6 performance or what?

7 **A. It wasn't -- to what I recall, it was just them, for**  
8 **over two hours, saying I wasn't a good K9 handler.**

9 Q. And Ms. Guerber is an employee of Beaumont and Mack and  
10 Wilkes are K9 Academy employees, right?

11 **A. Yes.**

12 Q. Not employees. Trainers?

13 **A. Can you repeat them again?**

14 Q. Mack and Wilkes?

15 **A. Yes.**

16 Q. Are the trainers?

17 **A. Yes.**

18 Q. Isn't it true that you were repeatedly told that no  
19 decision had been made to terminate your employment?

20 **A. I don't recall it.**

21 Q. Okay. It wasn't K9 Academy that decided to terminate  
22 your employment, was it?

23 **A. I honestly don't recall.**

24 Q. You admitted in your Complaint that nobody at K9 Academy  
25 knew that you had a general anxiety disorder or panic

**Tyler Maul**  
**02/05/2024**

**Page 92**

1 disorder before this meeting on August 16, 2022; is that  
2 correct, isn't it?

3 **A. On an official statement, I never officially told them,**  
4 **but they continuously referred to my anxiety. So yes,**  
5 **that is true.**

6 Q. Well, they referred to you, your stress, right?

7 **A. And my anxiety.**

8 Q. They said anxiety?

9 **A. Verbal, yes.**

10 Q. Okay. Do you know whether Mr. Mack or Mr. Wilkes are  
11 qualified to diagnose people with anxiety?

12 **A. I have no idea if they are or not.**

13 Q. Well, do you know how they knew that you had anxiety?

14 **A. No. But going off of what I know is that I have to be**  
15 **diagnosed by a doctor or a psychiatrist, not by people**  
16 **who work at the school.**

17 Q. Sure. Their observations there were that you were  
18 stressed, correct?

19 **A. And that I was anxious.**

20 Q. Okay. But did anybody ever say words to the effect that  
21 you have an anxiety disorder or a panic disorder?

22 **A. They said that I have anxiety. They never used the word**  
23 **disorder. They said anxiety.**

24 Q. It's important, so I want to make sure I'm clear. They  
25 said you have anxiety?

Tyler Maul  
02/05/2024

Page 104

1 anxiety. So there is a difference between the two. I  
2 definitely see it as two different.

3 Q. You can be stressed by uncertainty, right?

4 A. I mean, I would say anxious by uncertainty. That kind  
5 of fits in with it better.

6 Q. All right. You never told any K9 personnel, including  
7 Mack or Wilkes, that you had private health issues?

8 A. Correct, I did not.

9 Q. As far as you know, they didn't have that information  
10 regarding your general anxiety disorder or your panic  
11 disorder?

12 A. Correct.

13 Q. Okay. From what it sounds like, your discussion of  
14 Mr. Berger, Mr. Macbay and Mr. Teatsworth, they weren't  
15 the only folks that made observations that you appeared  
16 anxious?

17 A. Correct.

18 Q. Now did anybody from K9 Academy -- first of all, back  
19 up.

20 Did you ever ask K9 Academy for any type of  
21 accommodation?

22 A. Not that I can recall.

23 Q. Okay. Did you ever ask Beaumont for any kind of  
24 accommodation?

25 A. When it started to heighten up before I had to go on

**Tyler Maul**

**02/05/2024**

**Page 107**

1 Q. So when you needed the leave, you could take it?

2 A. Correct.

3 Q. Okay.

4 A. I honestly thought when it was approved things were  
5 going to get better. I didn't think they were going to  
6 get worse.

7 Q. Is it fair to say at the August 16 meeting that Mr. Mack  
8 expressed to you his belief that you didn't have the  
9 skills to be a K9 handler?

10 A. That was one of the things that was said in that  
11 meeting.

12 Q. Okay. Do you think he was telling you that because you  
13 had a disability?

14 A. I mean, I could see so because like a lot of the times  
15 they reference the word anxiety. Referencing the dog,  
16 how it goes down the leash, things like that. Or they  
17 are saying the dog is becoming anxious because I'm  
18 anxious, things like that.

19 Q. Okay. But we agree that at this August 16 meeting,  
20 nobody from K9 knew that you had an anxiety disorder or  
21 a panic disorder, correct?

22 A. To my knowledge, yes.

23 Q. Okay. Would you agree, with me, if you didn't have  
24 either of those and you just got really worked up about  
25 being a K9 handler, that that could be a reason to

**Tyler Maul**  
**02/05/2024**

**Page 163**

1 Q. So to sum up this little exercise, you have been able to  
2 identify your own voice on this recording, right?

3 **A. Yes.**

4 Q. And the voices of Whitney Guerber, Dan Mack and Mark  
5 Wilkes?

6 **A. Yes.**

7 Q. In your meeting with these folks, did you tell them  
8 anything that was untrue?

9 **A. Not that I know of.**

10 Q. Okay.

11 **A. I always try to tell the truth no matter where I go.**

12 Q. It's a good practice. All right.

13 Again, look at your Exhibit 1 which is the  
14 Complaint, page 28, paragraph 155. I will read 155, so  
15 we know what it is. "As detailed in the above  
16 allegations, Tucker, Guerber, Mack and Wilkes illegally,  
17 maliciously and wrongfully conspired with one another  
18 with the intent to and for illegal purposes of,  
19 including but not limited to, revoking Plaintiff's K9  
20 handler certification and terminating him from his  
21 employment as a K9 handler."

22 My question to you regarding that allegation  
23 is how do you know that Tucker, Guerber, Mack and Wilkes  
24 conspired with one another?

25 **A. Because when I brought up the concern about what was**

Tyler Maul  
02/05/2024

Page 164

1       happening to Lincoln, all of a sudden I get pulled into  
2       this office. It's way too close of a timeline for all  
3       of this to happen. And again, I have never signed  
4       anything and there is nothing in my employee file.

5   Q.   Okay. And you don't recall the timing though of how  
6       long between your Complaint and you getting called in on  
7       August 16, 2022?

8   A.   If I had to, like I said to you before, maybe three,  
9       four-ish weeks. Again, I don't know.

10   Q.   Okay. Anything else besides the timing?

11   A.   Nothing I can think of.

12   Q.   Okay. Have you come up with an economic damage figure  
13       ie. how much you have lost in wages and compensation as  
14       a result of the alleged conduct of my clients?

15   A.   Offhand, no. But what I do have is I can explain  
16       certain things like my medical bills. I have to seek  
17       medical treatment now.

18   Q.   Okay.

19   A.   Because of my anxiety, it's like tenfold now. Like I  
20       get scared just even doing the most simple things. I  
21       don't have the confidence in what I do.

22   Q.   But I'm talking about wages and benefits. You're  
23       talking about your non-economic damages. You were  
24       talking about medical expenses. But do you have a  
25       figure?



**Tyler Maul**  
**02/05/2024**

**Page 165**

1 **A. Not offhand, no.**

2 Q. Okay. Same exhibit starting at paragraph 28. It's  
3 titled Count 11, intentional infliction of emotional  
4 distress as to all defendants.

5 MS. GORMAN: What page are you on, Jim?

6 MR. FETT: 29. Count 11.

7 BY MR. FETT:

8 Q. If you look at page 29 at the top, it's got paragraph  
9 158. It says, "Defendants' conduct was extremely  
10 outrageous and of such character as not to be tolerated  
11 by a civilized society." Now you didn't write that  
12 language, did you?

13 **A. No.**

14 Q. That's legalese, correct?

15 **A. Correct.**

16 Q. But you agree with that?

17 **A. Yes.**

18 Q. Okay. And what you can summarize, because you have  
19 given us a lot of testimony today, but if you need to be  
20 more specific, that's fine. I'm just telling you it's  
21 okay if you want to generalize. Tell us the conduct  
22 that was extreme, outrageous and of a character as not  
23 to be tolerated.

24 **A. Well, I can refer back to when I asked and asked and**  
25 **asked for a peaceful resolution again and again knowing**

Tyler Maul  
02/05/2024

Page 166

1       how -- because what the recording there doesn't tell you  
2       is that I was through -- my anxiety was through the roof  
3       of what was going on. I asked Whitney, let's -- please,  
4       let's sit down. Let's talk. Let's figure this out.  
5       Let's come up with a solution.

6               I don't care what happens. I just want to get  
7       back to doing what I want to do, going back to what I  
8       love to do. Like it just seemed like every time I was  
9       trying to be that pacifist in the situation, more things  
10      were happening. They took my dog away. I had to go on  
11      intermittent leave, then I was suddenly on an  
12      investigation where I didn't even know I was on an  
13      investigation until my anxiety peaked to new heights.  
14      It just was thing after thing after thing.

15             I feel that was it was extreme. It was  
16      outrageous. And I feel like a credible and respectable  
17      employer would say this is not a way that an employer  
18      should treat somebody. I was willing, this entire time  
19      way before this happened, to sit down and talk so we can  
20      figure out what we can do, but nobody was having it.  
21      Nobody at K9-ATF, nobody at Beaumont.

22   Q.    Okay.

23   A.    I have it in writing saying I would just want a peaceful  
24      resolution. That's all I wanted.

25   Q.    All right. Anything else you want to add?

Tyler Maul  
02/05/2024

Page 167

1 A. No.

2 Q. You have got a number of defendants. We are looking at  
3 Beaumont Hospital, K9 Academy, the LLC, Joseph Tucker,  
4 Whitney Guerber, Daniel Mack and Mark Wilkes. Those are  
5 the folks that you have sued that are defendants,  
6 correct?

7 A. Correct.

8 Q. All right. Is there any one of those, whether an  
9 individual or a corporate entity, that you think is most  
10 responsible for what occurred as set forth in your  
11 lawsuit?

12 A. Like if one is more responsible than the other, yes.

13 Q. I call them bad actors. Who is the biggest bad actor  
14 here?

15 A. K9-ATF because I had no issues over at Beaumont, as I  
16 said a few times already. I had no issues in my  
17 employment. I get to K9-ATF, I do my school. If I was  
18 a bad handler I wouldn't have gotten my certification.  
19 If I was a bad handler and they passed me anyway, then  
20 that just shows negligence on their part.

21 But I passed through anyway. And nobody said  
22 anything to Beaumont to where I can say hey, you know  
23 what, maybe we can go about this. When I started  
24 noticing things, I bring it up to Beaumont's attention  
25 thinking they are going to help me. But instead chose